

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO.: 2:13-cv-02289 dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and,
MARK P. CLEMONS, M.D.,

Defendants.

NOTICE TO TAKE AUDIOVISUAL DEPOSITION OF DANIEL LOVELACE

To: Daniel Lovelace
c/o Mark Ledbetter
254 Court Avenue, Suite 305
Memphis, TN 38103

The attorneys for Dr. Mark Clemons will take the audiovisual deposition of Daniel Lovelace on Wednesday, January 15, 2014, at 12:00 p.m. at the law office of Mark Ledbetter, 254 Court Avenue, Suite 305, Memphis, TN 38103, upon oral examination pursuant to the Tennessee Rules of Civil Procedure before an officer duly authorized to administer oath.

The deposition shall continue from day to day until completed.

Respectfully submitted,

THOMASON HENDRIX HARVEY
JOHNSON & MITCHELL, PLLC

By: /s/ Marcy D. Magee
J. KIMBROUGH JOHNSON (7953)
MARCY D. MAGEE (19360)
Attorneys for Defendant, Mark Clemons, M.D.
40 South Main Street, 29th Floor
Memphis, TN 38103
(901) 525-8721

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

Mr. Mark Ledbetter
Halliburton & Ledbetter
254 Court Avenue, Suite 305
Memphis, TN 38103

Mr. David Cook
Mr. Al McLean
The Hardison Law Firm
119 S. Main Street, Suite 800
Memphis, TN 38103

This the 3rd day of January, 2014.

By: /s/ Marcy D. Magee
Marcy D. Magee